

ORIGINAL

CLARE E. CONNORS #7936  
United States Attorney  
District of Hawaii

CRAIG S. NOLAN  
Assistant U.S. Attorney  
Room 6-100, PJKK Federal Building  
300 Ala Moana Boulevard  
Honolulu, Hawaii 96850  
Telephone: (808) 541-2850  
Facsimile: (808) 541-2958  
Email: Craig.Nolan@usdoj.gov

Attorneys for Plaintiff  
UNITED STATES OF AMERICA

FILED IN THE  
UNITED STATES DISTRICT COURT  
DISTRICT OF HAWAII

OCT 20 2022  
at 7 o'clock and 15 min. P M  
John A. Mannle, Clerk

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,	)	CR. NO. 22-00031 DKW
	)	
Plaintiff,	)	SUPERSEDING INDICTMENT
	)	
v.	)	[18 U.S.C. § 875(c)]
	)	
LINDSEY KINNEY,	)	
aka "Cowboy,"	)	
	)	
Defendant.	)	
	)	

SUPERSEDING INDICTMENT

The Grand Jury charges:

Count 1  
Interstate Threat to Injure  
(18 U.S.C. § 875(c))

On or about January 17, 2022, within the District of Hawaii and elsewhere, LINDSEY KINNEY, aka “Cowboy,” the defendant, knowingly and willfully transmitted in interstate and foreign commerce a communication containing a threat to injure Victim 1, Victim 2, and Victim 3, namely a post on Instagram threatening to kill the victims by beheading.

All in violation of Title 18, United States Code, Section 875(c).

Count 2  
Interstate Threat to Injure  
(18 U.S.C. § 875(c))

On or about March 28, 2022, within the District of Hawaii and elsewhere, LINDSEY KINNEY, aka "Cowboy," the defendant, knowingly and willfully transmitted in interstate and foreign commerce a communication containing a threat to injure Victim 4, Victim 4's security staff, and Victim 5, namely a post on Instagram threatening to injure and kill the victims by beheading and other means.


All in violation of Title 18, United States Code, Section 875(c).

DATED: October 20, 2022, at Honolulu, Hawaii.

A TRUE BILL

/s/ Foreperson

\_\_\_\_\_  
FOREPERSON, GRAND JURY

  
\_\_\_\_\_  
CLARE E. CONNORS  
United States Attorney  
District of Hawaii

  
\_\_\_\_\_  
CRAIG S. NOLAN  
Assistant U.S. Attorney

United States v. Lindsey Kinney  
Superseding Indictment  
Cr. No. 22-00031 DKW